

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

ANGELA RUSSELL, AS ADMINISTRATRIX  
OF THE ESTATE OF JEREMY T. RUSSELL  
AND ON BEHALF OF THE WRONGFUL DEATH  
BENEFICIARIES OF JEREMY T. RUSSELL,

EXHIBIT 3

PLAINTIFF,

V.

CASE NO.3:22-cv-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION; et al.,  
DEFENDANTS.

\*\*\*\*\*  
DEPOSITION OF ANTHONY GIBSON  
\*\*\*\*\*

Taken at Adams & Reese  
1018 Highland Colony Parkway, Suite 800  
Ridgeland, Mississippi,  
on Wednesday, June 14, 2023,  
beginning at approximately 9:15 a.m.

\*\*\*\*\*

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A P P E A R A N C E S

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For the Defendants Michael McClinton; Ashley Ray;  
Marcus Robinson; Roxie Wallace; Jacob Vigliante;  
John and Jane Doe Correctional Officers:

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Also Present:  
Riley Saunders

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1 Correctional Facility?

2 A Yes, I was the highest ranking health  
3 administrator at the facility.

4 Q Okay. So there are doctors that work  
5 at the facility, correct?

6 A Yes. It's the health services  
7 administrator, and then it's a site medical  
8 director. And then you have the rest of the  
9 staff, like psychiatrists, other doctors, nurse  
10 practitioners, dentists. Everyone else fall up  
11 under us. So it's HSA, site medical director,  
12 then everyone else and then ancillary staff.

13 Q So the site medical director answers to  
14 the HSA?

15 A Yes.

16 Q And the site medical director in  
17 October of 2021 was Patrick Arnold?

18 A Yes.

19 Q Is there a separate person who's in  
20 charge of mental health services?

21 A No. The health services administrator  
22 is in charge of everything. Now, the regional  
23 team, they are something like advisors to the  
24 site staff. But the health services  
25 administrator is over psychiatry, mental health,

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1 less likely for a person to commit suicide if you  
2 have someone there watching them or someone in  
3 the area. It's less likely. That's why they had  
4 the one-on-ones, or that's why you have security  
5 in these areas.

6 But if you don't have no one there and  
7 you give these people space to just create -- be  
8 creative and think, things happen, especially  
9 from how my mental health team, they came up with  
10 a conclusion, and they came up with this dealing  
11 with from testing and observation, that a lot of  
12 -- some of these guys, not a lot, some of these  
13 guys, drugs had a play in it. It confused their  
14 minds and have you doing different things. That  
15 came from the mental health team, not from me.

16 But I had the conversation with the  
17 commissioner something has to give here. Do some  
18 shakedowns in these prisons, take some of these  
19 drugs from these folks. And how are our mental  
20 health folks end up receiving drugs? How these  
21 people receiving drugs? And they locked up? Who  
22 getting it to them, you know? And that same -- I  
23 typed up the little thing. It's even in the MAC  
24 minutes that here it is, you have an inmate  
25 floating around watching inmates. Where is the

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1       on seg areas, you know. And they went for  
2       it, and they started doing it.

3       BY MR. BRAGG:

4       Q       Why did you suggest to give them a  
5       raise? How would that make a difference? Or to  
6       give them bonus, I think you said.

7       A       They wouldn't go down there no other  
8       way. A little increase in pay, some of them went  
9       for it. But they would rather work in Housing  
10      Unit 1 or Housing Unit 3 or 2 before they go to  
11      5. But you give them a couple dollars, you got  
12      some to go there and work.

13      Q       That was only -- did that ever happen  
14      in camp support? Did you guys ever give a bonus  
15      for folks in camp support?

16      A       Camp support always had staff. I mean  
17      always. I can't recall a moment that staff  
18      wasn't in camp support. That day there was just,  
19      you know, those officers were pulled to go  
20      transport. So they had to have been real short  
21      in the facility in order to pull somebody out of  
22      camp support.

23              Camp support have their own team, own  
24      security team. Just like medical. Medical have  
25      a team of security that they always up in there.

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1 Now, if somebody go on vacation, you have  
2 somebody come replace. You know, sometimes they  
3 never replace. They have one person, you know.  
4 But camp support always had, like, as two-woman  
5 or man crew in there.

6 Q Did you know of anybody working for MTC  
7 at the time that you were there at East  
8 Mississippi that left to take more money  
9 somewhere else?

10 MR. YOUNG: Object to the form.

11 THE WITNESS: No, I can't recall that.  
12 Not right now, I can't recall that.

13 MR. BRAGG: Okay. Then I also join in  
14 your objection.

15 BY MR. BRAGG:

16 Q Was there a -- did anybody have any  
17 conversations about monetary compensation for the  
18 family of Jeremy Russell that you're aware of?

19 A Not that I'm aware of.

20 Q Okay.

21 MR. BRAGG: That's all I have.

22 EXAMINATION

23 BY MR. CHASE:

24 Q Mr. Gibson, my name is Michael Chase.  
25 We were introduced before the deposition started.

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1 That's Housing Unit 5. I didn't have to say you  
2 need security staff in camp support because you  
3 already have it. Security is always there in  
4 camp support.

5 But Housing Unit 5, that was a concern  
6 that officers needed to be down there. We had  
7 too many attempting suicides, suicides. It was  
8 just too much going on in that area to say that's  
9 a seg location, there's no movement.

10 Q I believe you testified that you-all  
11 would discuss that often at the meetings,  
12 correct?

13 A Yes, because it wasn't getting done.  
14 We couldn't get it done.

15 Q And [Exhibit 3](#) here would be the minutes  
16 that were taken about the discussion had at the  
17 meeting; is that right?

18 A Yes.

19 Q Okay. I want you to take some time to  
20 look through that document and show me where  
21 you-all mentioned the lack of security or the  
22 need for security in the facility. You can take  
23 your time and review it.

24 A If you can look at that 0010.

25 Q Is that the third page? What page is

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1 at any point relay that information to an MTC  
2 official or staff member?

3 A If a patient is talking suicide  
4 ideations or anything like that, yes, we  
5 communicate that to security and let them know.  
6 And then the warden will ask us, "Well, what  
7 y'all want to do? Do y'all want to put that  
8 person on one-on-one?" It's up to the provider,  
9 you know, to do that. Every concern of a person  
10 talking out of their mind or talking crazy, we  
11 have to let them know so staff won't get hurt.  
12 Yes, we always let them know, yes.

13 Q I'm a little confused. You testified  
14 that you didn't talk to McClinton, Vigliante or  
15 any staff prior to Russell's death. But now  
16 you're saying that you did relay Angela Russell's  
17 concern about Jeremy to MTC.

18 A Well, I didn't. My staff -- and I know  
19 this for sure -- that when a person is  
20 threatening suicide or something like that, we  
21 have to report and relay that to the warden and  
22 them.

23 Q How are you sure that happened in this  
24 case?

25 A I'm not sure that happened. But that's



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1 our process, that -- as a matter of fact, the  
2 nurse practitioner is the one that communicated  
3 to them about we've got to be careful or  
4 whatever. They the one that relayed that  
5 information to security staff to let them know,  
6 hey, this is what we've got going on. And then  
7 they decide to either put that person on  
8 one-on-one or whatever. But that's always  
9 communicated out. That's how you get your  
10 orders. That's how they do their orders. And  
11 security go by the orders. Every day you might  
12 see an order regarding a patient. And that's how  
13 the communication is going out there, is through  
14 orders. Yeah.

15 Q I appreciate that. What I want to know  
16 is did you communicate that personally to anyone  
17 on MTC's staff regarding Jeremy Russell talking  
18 out of his head?

19 A No.

20 Q Okay. You testified earlier that there  
21 was no security in camp support because the  
22 security was pulled to another unit. Do you  
23 recall that?

24 A They was pulled away from the facility  
25 for transport.

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1 clothes.

2 Q Did Angela Russell ever relay to you  
3 that somebody told her that?

4 A I can't recall that.

5 Q Okay. I want to go to the third bullet  
6 point, October 6, 2021. Did you have that  
7 conversation with Angela Russell on October 6,  
8 2021?

9 A I remember having a conversation with  
10 her about she's saying -- she's saying right here  
11 the plan of self-harm. But she said he was  
12 talking crazy, talking out of his mind. And she  
13 needs to speak to Nurse Dunn. I sort of remember  
14 that. But moving from camp support, I can't  
15 recall a request for him to be moved. I can't  
16 recall that. And saying that camp support is the  
17 safest place, I can't recall that.

18 Q Do you ever recall Angela Russell  
19 mentioning self-harm or suicidal ideations to you  
20 on October 6, 2021?

21 A I can't recall.

22 Q Are you familiar with the contract  
23 between MTC and MDOC?

24 A Can you repeat that?

25 Q Are you familiar -- let me ask it like

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1 this. Are you familiar with MTC's role at EMCF?  
2 Do you know what their role is, that company's  
3 role at that facility?

4 A Not in its entirety, but I do know  
5 provide security.

6 Q Would you agree that MTC has no role in  
7 the medical treatment, the healthcare treatment  
8 of the inmates at the facility?

9 A I agree.

10 Q Okay. Getting to my final questions,  
11 so I appreciate your patience. Mr. Gibson, you  
12 made a lot of the comments here today and in your  
13 statements about security issues at the facility.  
14 Do you recall making these comments?

15 A Pertaining to what?

16 Q Security issues at the facility.

17 A Yes.

18 Q Do you recall making comments or  
19 findings that the security issues and the drug  
20 usage may have been the cause of suicides and  
21 Jeremy Russell's at the facility?

22 A We would always say it played a part.  
23 We didn't -- we would never say it's the cause of  
24 it. But, you know, it's a part of what's going  
25 on.

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1 more days than the day of his death. Do you  
2 agree with that, that camp support was  
3 chronically understaffed?

4 A As far as understaffed, no.

5 Q That's right, I believe you testified  
6 earlier that camp support always had staff in  
7 that area; is that right?

8 A I'm not going to say adequate staff,  
9 but they have someone there just about all the  
10 time, even if it's one person. But it usually be  
11 two, you know, because you have somebody to float  
12 and somebody working the board. So you need two.  
13 But even if it's one, someone is there.

14 Q So would you agree with me if I said  
15 that it's not typical for camp support to not  
16 have staff in it?

17 A Yes, I agree.

18 Q I want to direct your attention now to  
19 Page 9 of [Exhibit 7](#). That's Opinion 3, Roman  
20 numeral VIII, I believe. I want to give you a  
21 second to review Opinion 3, which goes over to  
22 Page 10. Same instructions. If you see anything  
23 you disagree with, let me know and tell me why  
24 you disagree with it.

25 A All right. Now, on the first paragraph